

Jim Willard #42-045-08870.
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Air Protection Division

Monroe Energy, L.L.C.
4101 Post Road
Trainer, PA 19061
(610) 364-8000

April 17, 2015

FedEx

Mr. James Rebarchak
Air Quality Program
Commonwealth of Pennsylvania
Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: Monroe Energy, LLC – Trainer Refinery
First Quarter (1Q2015) PADEP VOC Fugitive Monitoring Report
Title V Operating Permit No. 23-00003

Dear Mr. Rebarchak:

As required by Pennsylvania Code, Title 25, §129.58(f), the Monroe Energy, LLC (Monroe Energy) Trainer Refinery hereby submits the VOC Fugitive Emissions Monitoring Report for the period January 1, 2015 thru March 31, 2015.

This report consists of the following documents:

- Compliance Monitoring Summary Pennsylvania Title 25, Section 129.58.
- Compliance Repair Delay List Pennsylvania Title 25, Section 129.58.
- Compliance Report Repair Delayed History – Components Repaired During Report Period, Pennsylvania Title 25, Section 129.58.
- Compliance Report – Components Added and Deleted During Report Period, Pennsylvania Title 25, Section 129.58.

As required by the Consent Decree H-05-0258, paragraph 236, Monroe Energy is hereby notifying the Department that the report leak rates contained herein for valves and pumps are those applicable regulatory leak definitions defined in Pennsylvania Code, Title §129.58(a).

During the reporting period, all components were monitored in accordance with Monroe Energy's Alternate LDAR Plan Monitoring Schedule and no late repairs were recorded. Also, per the aforementioned Consent Decree, all valves with a leak rate of over 10,000 ppm that required a Drill and Tap were successfully repaired to a leak rate less than 500 ppm and were not placed on Delay of Repair list.

Mr. James Rebarchak

October 16, 2014

Page 2

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained herein are true, accurate, and complete.

Should you have any questions or comments regarding this report, please contact Stephani Ski Szymanski, Environmental Engineer and Program Lead, at (610) 364-8073.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Warmann', with a long horizontal flourish extending to the right.

Jeffrey K. Warmann
CEO & President

Enclosures

cc: Office of Air Enforcement & Compliance Assistance (3AP20)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029
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1Q2015 PADEP QUARTERLY LDAR REPORT
SUMMARY REPORT
REPORT DATE: APRIL 17, 2015
REPORT COMPLIANCE PERIOD: JAN 01 - MAR 31, 2015

<u>Regulation</u>	<u>ComplianceGroup</u>	<u>Class</u>	<u>Month</u>	<u>Monitore</u>	<u>Leaked</u>	<u>Late Repair</u>
<u>PAREF</u>	<u>543 CRUDE</u>					
		PUMP	1	4	0	0
		PUMP	2	4	0	0
		PUMP	3	4	0	0
		RELIEF	2	8	0	0
		VALVE	1	22	0	0
		VALVE	2	1,076	0	0
		VALVE	3	10	0	0
				<u>1,128</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>544 CRUDE</u>					
		PUMP	1	15	0	0
		PUMP	2	15	0	0
		PUMP	3	15	0	0
		RELIEF	2	8	0	0
		VALVE	1	14	0	0
		VALVE	2	1,168	0	0
		VALVE	3	11	0	0
				<u>1,246</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>544 VACUUM</u>					
		PUMP	1	2	0	0
		PUMP	2	2	0	0
		PUMP	3	2	0	0
		RELIEF	2	7	0	0
		VALVE	1	2	0	0
		VALVE	2	392	0	0
				<u>407</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>ALKY</u>					
		PUMP	1	22	0	0
		PUMP	2	22	0	0
		PUMP	3	22	0	0
		RELIEF	2	16	0	0
		RELIEF	3	14	0	0
		VALVE	1	4	0	0
		VALVE	2	2,472	1	0
		VALVE	3	12	0	0
				<u>2,584</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>AMINE</u>					

		PUMP	1	1	0	0
		PUMP	2	1	0	0
		PUMP	3	1	0	0
		RELIEF	1	5	0	0
		VALVE	1	330	0	0
				<u>338</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>AWWTP</u>					
		VALVE	1	140	0	0
				<u>140</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BLEND</u>					
		PUMP	1	14	0	0
		PUMP	2	15	0	0
		PUMP	3	15	0	0
		RELIEF	1	16	0	0
		VALVE	1	1,190	0	0
				<u>1,250</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BOILER</u>					
		RELIEF	2	1	0	0
		VALVE	2	126	0	0
		VALVE	3	4	0	0
				<u>131</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BOILERS 9 & 10</u>					
		RELIEF	3	4	0	0
		VALVE	2	429	0	0
				<u>433</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BUTANE</u>					
		RELIEF	2	7	0	0
		VALVE	2	298	0	0
		VALVE	3	3	0	0
				<u>308</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>DESALT</u>					
		PUMP	1	10	0	0
		PUMP	2	10	0	0
		PUMP	3	10	0	0
		RELIEF	1	12	0	0
		VALVE	1	799	0	0
		VALVE	3	8	0	0
				<u>849</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>DIESEL</u>					
		PUMP	1	11	0	0
		PUMP	2	11	0	0
		PUMP	3	11	0	0
		RELIEF	1	9	0	0

		VALVE	1	775	1	0
		VALVE	2	1	0	0
		VALVE	3	10	0	0
				<u>828</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>FCC</u>					
		PUMP	1	19	0	0
		PUMP	2	19	0	0
		PUMP	3	19	0	0
		RELIEF	2	22	0	0
		VALVE	1	2	0	0
		VALVE	2	1,620	0	0
		VALVE	3	1	0	0
				<u>1,702</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>FLARE</u>					
		PUMP	1	3	0	0
		PUMP	2	3	0	0
		PUMP	3	3	0	0
		VALVE	3	201	0	0
				<u>210</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>ISOCRK</u>					
		COMPR	1	1	0	0
		COMPR	2	1	0	0
		COMPR	3	1	0	0
		PUMP	1	17	0	0
		PUMP	2	17	0	0
		PUMP	3	17	0	0
		RELIEF	1	56	0	0
		VALVE	1	3,034	3	0
		VALVE	2	419	0	0
		VALVE	3	14	0	0
				<u>3,577</u>	<u>3</u>	<u>0</u>
<u>PAREF</u>	<u>KERO</u>					
		COMPR	1	1	0	0
		COMPR	2	1	0	0
		COMPR	3	1	0	0
		PUMP	1	9	0	0
		PUMP	2	9	0	0
		PUMP	3	9	0	0
		RELIEF	1	30	0	0
		VALVE	1	1,515	1	0
		VALVE	2	17	0	0
		VALVE	3	6	0	0
				<u>1,598</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>LOWLN</u>					
		PUMP	1	4	0	0
		PUMP	2	4	1	0

		PUMP	3	4	0	0
		RELIEF	1	6	0	0
		VALVE	1	543	0	0
		VALVE	2	4	0	0
		VALVE	3	4	0	0
<u>PAREF</u>	<u>MARINE</u>			<u>569</u>	<u>1</u>	<u>0</u>
		RELIEF	2	8	0	0
		VALVE	2	185	0	0
				<u>193</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>NAPHTH</u>	PUMP	1	13	0	0
		PUMP	2	13	0	0
		PUMP	3	13	0	0
		RELIEF	3	13	0	0
		VALVE	1	1	0	0
		VALVE	2	1	0	0
		VALVE	3	1,493	1	0
				<u>1,547</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>PLATFO</u>	COMPR	1	1	0	0
		COMPR	2	1	0	0
		COMPR	3	1	0	0
		PUMP	1	8	0	0
		PUMP	2	8	0	0
		PUMP	3	8	0	0
		RELIEF	3	30	0	0
		VALVE	1	7	0	0
		VALVE	2	6	0	0
		VALVE	3	2,171	0	0
<u>PAREF</u>	<u>PRORCL</u>			<u>2,241</u>	<u>0</u>	<u>0</u>
		PUMP	1	1	0	0
		PUMP	2	1	0	0
		PUMP	3	1	0	0
		RELIEF	3	3	0	0
		VALVE	3	313	0	0
				<u>319</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>PROREC</u>	RELIEF	2	6	0	0
		RELIEF	3	2	0	0
		VALVE	1	2	0	0
		VALVE	2	600	0	0
		VALVE	3	5	0	0
				<u>615</u>	<u>0</u>	<u>0</u>

<u>PAREF</u>	<u>PROSTO</u>	PUMP	1	6	0	0
		PUMP	2	6	0	0
		PUMP	3	6	0	0
		RELIEF	1	20	0	0
		VALVE	1	540	1	0
		VALVE	2	2	0	0
		VALVE	3	2	0	0
				<u>582</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>REFORM</u>	PUMP	1	8	0	0
		PUMP	2	8	0	0
		PUMP	3	8	0	0
		RELIEF	2	11	0	0
		VALVE	2	826	0	0
		VALVE	3	15	0	0
				<u>876</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SOUR</u>	RELIEF	2	2	0	0
		VALVE	2	48	0	0
		VALVE	3	4	0	0
				<u>54</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SOUTH TANK FARM</u>	RELIEF	1	1	0	0
		RELIEF	2	1	0	0
		RELIEF	3	6	0	0
		VALVE	3	55	0	0
				<u>63</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SRU</u>	RELIEF	1	3	0	0
		VALVE	1	76	0	0
				<u>79</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SUNOL</u>	RELIEF	3	3	0	0
		VALVE	1	10	0	0
		VALVE	3	195	0	0
				<u>208</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>TAIL GAS</u>	RELIEF	1	3	0	0
		VALVE	1	163	0	0
				<u>166</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>TF</u>	PUMP	1	40	0	0

			PUMP	2	40	0	0
			PUMP	3	40	0	0
			RELIEF	1	2	0	0
			RELIEF	3	101	0	0
			VALVE	1	2	0	0
			VALVE	2	2	0	0
			VALVE	3	3,237	0	0
<u>PAREF</u>	<u>VACUUM</u>						
			PUMP	1	2	0	0
			PUMP	2	2	0	0
			PUMP	3	2	0	0
			RELIEF	1	3	0	0
			VALVE	1	487	0	0
			VALVE	2	1	0	0
			VALVE	3	1	0	0
<u>PAREF</u>	<u>VGO</u>						
			PUMP	1	1	0	0
			PUMP	2	1	0	0
			PUMP	3	1	0	0
			RELIEF	1	11	0	0
			VALVE	1	613	0	0
					<u>627</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>WGS</u>						
			PUMP	1	4	0	0
			PUMP	2	4	0	0
			PUMP	3	4	0	0
			RELIEF	3	4	0	0
			VALVE	2	9	0	0
			VALVE	3	436	0	0
					<u>461</u>	<u>0</u>	<u>0</u>
<u>Grand Total:</u>					<u>29,291</u>	<u>10</u>	<u>0</u>

* Database "LeakDas" Operated by Inspection Logic Summary Report Identifes components placed on Delay of Repair as "late Repairs." DOR components have been removed from this summary and only the "true" Late Repairs have been recorded

1Q 2015 PADEP QUARTERLY LDAR REPORT
ON DELAY OF REPAIR COMPONENTS
REPORT DATE: APRIL 17, 2015
REPORT COMPLIANCE PERIOD: JAN 01, 2015 - MAR 31, 2015

TAG	CLASS	AREA	Placed On Delay
TOTAL:			0

1Q 2015 PADEP QUARTERLY LDAR REPORT

ADDED AND DELETED

REPORT DATE: APRIL 17, 2015

REPORT COMPLIANCE PERIOD: JAN 01, 2015 - MAR 31, 2015

Compliance Group	Class	Added	Delet
543 CRUDE	PRESSURE RELIEF DEVICE	0	0
543 CRUDE	PUMP	0	0
543 CRUDE	VALVE	6	6
544 CRUDE	PRESSURE RELIEF DEVICE	0	0
544 CRUDE	PUMP	0	0
544 CRUDE	VALVE	6	0
544 VACUUM	PRESSURE RELIEF DEVICE	0	0
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	0
ALKY	PRESSURE RELIEF DEVICE	0	0
ALKY	PUMP	0	0
ALKY	VALVE	9	1
AMINE	PRESSURE RELIEF DEVICE	0	0
AMINE	PUMP	0	0
AMINE	VALVE	0	0
AWWTP	VALVE	0	0
BLEND	PRESSURE RELIEF DEVICE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	0	0
BOILER	PRESSURE RELIEF DEVICE	0	0
BOILER	VALVE	4	0
BOILERS 9 & 10	PRESSURE RELIEF DEVICE	0	0
BOILERS 9 & 10	VALVE	0	0
BUTANE	PRESSURE RELIEF DEVICE	0	0
BUTANE	VALVE	0	0
CRUDE	PRESSURE RELIEF DEVICE	0	0
CRUDE	PUMP	0	0
CRUDE	VALVE	0	0
DESALT	PRESSURE RELIEF DEVICE	0	0
DESALT	PUMP	0	0
DESALT	VALVE	8	0
DIESEL	COMPRESSOR	0	0
DIESEL	PRESSURE RELIEF DEVICE	0	0
DIESEL	PUMP	0	0
DIESEL	VALVE	0	0
FCC	PRESSURE RELIEF DEVICE	0	0
FCC	PUMP	0	0
FCC	VALVE	0	6
FLARE	PRESSURE RELIEF DEVICE	0	0
FLARE	PUMP	0	0
FLARE	VALVE	0	0
ISOCRK	COMPRESSOR	0	0
ISOCRK	PRESSURE RELIEF DEVICE	8	2
ISOCRK	PUMP	0	0
ISOCRK	VALVE	413	9
KERO	COMPRESSOR	0	0
KERO	PRESSURE RELIEF DEVICE	0	0

WGS	COMPRESSOR	0	0
WGS	PRESSURE RELIEF DEVICE	0	0
WGS	PUMP	0	0
WGS	VALVE	4	0
TOTAL:		498	76